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# NARRATIVE

TO: Hamid Yavari

FROM: Tracey Hiltunen

DATE: May 11, 2020

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|---|---|
| Facility Name: | **Norfolk Southern Railway Company - Chattahoochee TBT** |
| AIRS No.: | 121-00962 |
| Location: | Atlanta, GA (Fulton County) |
| Application #: | 27467 |
| Date of Application: | March 12, 2020 |

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**Background Information**

Norfolk Southern Railway Company submitted Application No. 27467, dated March 12, 2020, requesting authorization to construct and operate a new a facility to store and transfer volatile organic liquid and bulk solid commodities between railcars and trucks. The plant will be located at 3095 Parrott Avenue Northwest in Atlanta, Georgia. Equipment at the plant will include a loading rack, storage tanks, and a vapor combustion unit (VCU) for controlling emissions. The facility will be a synthetic minor source (SM) in regard to Title V.

**Purpose of Application**

The facility submitted an air quality permit application, which was received on March 12, 2020, and assigned Application No. 27467. The application is for the construction and operation of a new facility to store and transfer volatile organic liquid and bulk solid commodities between railcars and trucks.

The facility will allow for the transfer of product from railcars to three internal floating roof storage tanks and then from the storage tanks to a truck-loading rack with a VCU to control volatile organic compounds (VOC) or directly to a pipeline. The project will provide for the transloading of two additional products that will generate VOC emissions in lesser quantities. One of these products will be transferred from railcars to one storage tank and the other product will be transferred from railcars to ten pressurized storage tanks prior to being transferred to trucks. The facility will utilize one portable pump to directly transload product to trucks without an intermediate storage tank. Solid products will also be transloaded from railcars to trucks.

Since the facility-wide VOC emissions will be greater than 25 tons per year, the facility is subject to Georgia Rule (tt) – "VOC Emissions from Major Sources," and requires a RACT (Reasonably Available Control Technology) analysis. A public advisory was issued and expires on June 5, 2020.

## Updated Equipment List

The table below lists all equipment which is referenced specifically by the permit, or for which an applicable regulation exists.

| Emission Units | | Air Pollution Control Devices | | Federal Rule Applicability |
|---|---|---|---|---|
| ID No. | Description | ID No. | Description | |
| EU-1 | Transloading – Storage Tanks EU-4, EU-5, EU-6, and EU-7 to Tanker Truck through Loading Rack | VCU | Vapor Combustion Unit | n/a |
| EU-2 | Direct Transloading – Railcar to Truck | n/a | n/a | n/a |
| EU-3 | Transloading – Railcar to Storage Tank (Tank 105 through Tank 114) | n/a | n/a | n/a |
| EU-4 | Tank 101 – Internal Floating Roof | n/a | Mechanical shoe seal with secondary wiper seal. | 40 CFR 60 Subpart Kb |
| EU-5 | Tank 102 – Internal Floating Roof | n/a | Mechanical shoe seal with secondary wiper seal. | 40 CFR 60 Subpart Kb |
| EU-6 | Tank 103 – Internal Floating Roof | n/a | Mechanical shoe seal with secondary wiper seal. | 40 CFR 60 Subpart Kb |
| EU-7 | Tank 104 – Vertical Fixed Roof | n/a | n/a | n/a |
| EU-8 | Bulk Solids Direct Transloading | n/a | n/a | n/a |

*proposed within current application
**VCU applies to transloading product from Storage Tanks EU-4, EU-5, and EU-6 through loading rack to tanker truck.

## Emissions Summary

Emission calculations were submitted by the facility and reviewed by the Division. Emission factors were obtained from AP-42 Sections 5.2, 13.5, 1.4, 1.5, and U.S. EPA’s TANKS 4.09d software. The table below summarizes potential emissions for the facility. VOC is the main pollutant of concern. In order to provide synthetic minor status, the throughput for transloading operations EU-1 from Storage Tanks EU-4, EU-5, and EU-6 to tanker trucks is limited to 600,000,000 gallons during any twelve consecutive month period.

**Facility-Wide Emissions**
(in tons per year)

| Pollutant | Potential Emissions (Controlled) | Actual Emissions* (Controlled) |
|---|---|---|
| $PM/PM_{10}/PM_{2.5}$ | 6.6 | 6.6 |
| NOx | 13.9 | 13.9 |
| $SO_2$ | 0.1 | 0.1 |
| CO | 75.4 | 75.4 |
| VOC | 93.9 | 93.9 |
| Max. Individual HAP | 4.8 | 4.8 |
| Total HAP | 11.2 | 11.2 |

| Pollutant | Potential Emissions (Controlled) | Actual Emissions* (Controlled) |
|---|---|---|
| Total GHG (if applicable) | n/a | n/a |

*The Division assumed actual emissions to be equal to potential emissions. Actual emissions are expected to be lower based on product loading.

**Regulatory Applicability**

40 CFR 60 Subpart Kb – "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984," applies to Tanks EU-4, EU-5, and EU-6. The Permittee is required to visually inspect the roof and seals for tanks fitted with internal floating roofs to meet the requirements under Subpart Kb. Periodic inspections are required following the initial filling of the tank. Repairs are required to be made as necessary. The facility is required to keep records of the inspections and report problems to the Division as directed by the subpart. The facility is required to provide notification to the Division prior to filling or refilling to afford the Division an opportunity to conduct a tank inspection.

Georgia Rule (b) – "Visible Emissions" limits the opacity from all sources to less than 40 percent if the source is not subject to other emission limits. This rule is applicable and compliance with this rule is expected.

Georgia Rule (e) – "Particulate Emission from Manufacturing Processes" applies to processes and limits particulate emissions according to the formula: $E = 4.1P^{0.67}$, where E equals the allowable emission rate in pounds per hour and P equals the process input weight rate in tons per hour. Compliance with this rule is expected.

Georgia Rule (n) – "Fugitive Dust" requires the facility to take the steps necessary to minimize fugitive dust and limit the VE of fugitive dust to 20 percent opacity.

Since the facility-wide VOC emissions will be greater than 25 tons per year, the facility is subject to Georgia Rule (tt) – "VOC Emissions from Major Sources," and a RACT (Reasonably Available Control Technology) analysis is required to be conducted. The following is the RACT analysis.

**RACT Review for VOC**

**Storage Tanks EU-4, EU-5, and EU-6**

The facility will operate three internal floating roof (IFR) storage tanks that receive VOL via railcar. Emissions of VOC are a result of working and breathing losses from the storage and loading of the tanks.

*RACT Floor*

The requirements of NSPS Kb will apply to the proposed IFR storage tanks. The storage tanks must, at a minimum comply with one of the control options specified in NSPS Kb (§60.112b). The facility will comply with NSPS Kb by equipping each storage tank with an internal floating roof as prescribed in §60.112b(a)(1).

Identify Available Control Technologies

A search of U.S. EPA's Reasonably Available Control Technology/Best Available Control Technology/Lowest Achievable Emission Rate Clearinghouse (RBLC) for control technologies utilized to reduce VOC emissions from Volatile Organic Liquid Storage, Process Type 42.009, resulted in the following control technologies or mitigation techniques for VOL storage vessels.

- VCU;
- Vapor Recovery Unit (VRU);
- Submerged fill design;
- Light-colored exterior; and
- Good design and maintenance.

Eliminate Technically Infeasible Options

Each of the control technologies identified is considered technically feasible, with the exception of a VRU. VRUs are designed for solvent recovery or gasoline recovery and are not suitable for this products recovery. VRUs are designed for a given adsorbent-VOC combination at a given temperature and are not designed for variable inlet streams, nor are VRUs designed for streams that could be laden with this product's vapors. Adsorptivity increases with increasing VOC partial pressure and decreases with increasing temperature. The partial pressure of this product is much lower than other vapor components; as such, absorptivity would decrease with an increase in this products concentration. Additionally, this control is generally ill-advised by control technology vendors in the upstream and midstream oil and gas sector. This product's vapors cause VRU systems to "overheat" during the vapor recovery process; therefore, VRUs will not work for the proposed application. As such, VRUs are determined to be technically infeasible and are eliminated from further consideration.

Rank Remaining Technically Feasible Control Options

The remaining control technologies for minimizing VOC emissions from the storage tanks are ranked in order of effectiveness as follows:

1. Vapor Combustion (98%)
2. Submerged Fill Design, Good Design and Maintenance, and Light-Colored Exterior

Evaluate Remaining Control Technologies

Generally, BACT, which is more stringent program than RACT, for similar storage tanks is accepted to be an internal floating roof design and compliance with NSPS Kb. It can be inferred that addition of a vapor control system to tanks storing this product (or similar products) is generally not cost effective for the purposes of BACT; as such, is not a viable RACT option. For additional consideration, vapor combustion controls will result in additional NOx and VOC from the products of supplemental fuel combustion in an area of moderate nonattainment for ozone. For these reasons, vapor combustion units are eliminated from further consideration for RACT.

The facility proposes RACT to be a combination of the remaining control technologies: to use an internal floating roof tank, submerged fill design, and a light-colored exterior for the storage tank. Each storage tank will be constructed using good engineering design and operated according to manufacturer-specified maintenance, and/or industry standards, as appropriate, and in accordance with NSPS Kb requirements.

Select RACT

Each storage tank will be equipped with a submerged fill pipe, will have a light-colored exterior and will be constructed using good engineering design and operated according to testing and procedures outlined in NSPS Kb (§60.113b), manufacturer-specified maintenance, and/or industry standards, as appropriate. Good engineering design satisfies the requirements of NSPS Kb and consists of an internal floating roof with welded seams, mechanical shoe primary seal, and rim mounted secondary seal.

**Storage Tank EU-7**

The facility will operate one vertical fixed roof (VFR) storage tank that receives VOL via railcar. VOC emissions result as working and breathing losses from the storage and loading of the tank.

*RACT Floor*

There are no federal or state emission standards for VOCs emitted from the proposed VFR tank.

Identify Available Control Technologies

A search of U.S. EPA's RBLC for control technologies utilized to reduce VOC emissions from Volatile Organic Liquid Storage, Process Type 42.009, resulted in the following control technologies or mitigation techniques for VOL storage vessels.

- VCU;
- VRU;
- Submerged fill design;
- Light-colored exterior; and
- Good design and maintenance.

Eliminate Technically Infeasible Options

This product has a maximum vapor pressure of less than 0.01 psia and due to its low vapor pressure, may be stored in a fixed roof tank. As such, this product is considerably less volatile than other products stored and loaded at typical VOL storage and loading facilities. This product, a low-volatility liquid, will not saturate the vapor space of the vertical fixed roof tank with a high concentration of combustible vapors. The concentration of organic vapors will be too low for vapor combustion units and vapor recovery units to effectively control VOC emissions.

Rank Remaining Technically Feasible Control Options

All remaining mitigation techniques are feasible and will be implemented to reduce VOC emissions from the storage tank. Therefore, no ranking is necessary for further evaluation.

Evaluate Remaining Control Technologies

Certain tanks are exempt from control requirements under federal NSPS and NESHAP rules – generally due to having low vapor pressure and/or small size. The U.S. EPA and Georgia EPD have determined through rulemaking that additional controls are generally not feasible for such sources.

*RACT Limit Overview*

GRAQC 391-3-1-.02(2)(vv) is not applicable to the facility; however, this regulation requires storage tanks with a capacity greater than 4,000 gallons that receive VOL from a delivery vessel to be equipped with a submerged fill pipe to minimize VOC emissions. The tank will have organic compounds stored at a maximum true vapor pressure less than 0.01 psia. No other federal or state regulations were found for similar activities were found. Although the facility will not receive VOL from a delivery vessel, the storage tank will be equipped with a submerged fill pipe.

All remaining mitigation techniques are feasible and will be implemented to reduce VOC emissions from the storage tank. No additional evaluation or comparison of controls is necessary.

Select RACT

The storage tank will be equipped with a submerged fill pipe, will have a light-colored exterior and will be constructed using good engineering design and operated according to manufacturer-specified maintenance, and/or industry standards, as appropriate.

**Truck Loading Rack Transloading EU-1**

The facility will dispense products to trucks from three IFR storage tanks and one VFR storage tank via a three-bay loading rack. VOC emissions are emitted as vapor is displaced from the trucks.

*RACT Floor*

There are no federal or state emission standards for VOCs emitted from the proposed truck loading rack. The facility has reviewed federal and state emission standards for VOCs emitted from bulk gasoline terminals and gasoline distribution facilities for a starting point regarding potentially available control technologies.

Identify Available Control Technologies

A search of U.S. EPA's RBLC for control technologies utilized to reduce VOC emissions from "Loading Racks," resulted in the following control technologies or mitigation techniques for loading processes.

- Vapor Balance System;
- VCU;
- VRU; and
- Submerged fill design.

Eliminate Technically Infeasible Options

Add-on control devices such as a VCU and VRU are not technically feasible for controlling emissions from the loading rack during product transfers from EU-7 to tanker trucks through the loading rack. The concentration of VOCs from product loading from EU-7 to tanker trucks will be well-below the concentration that a vendor will guarantee for the outlet from a VCU or VRU, typically 10 to 15 mg/L loaded. Without a vendor guarantee, a VCU or VRU are considered technically infeasible for reducing VOC emissions from product loading from EU-7 to tanker trucks through the loading rack. A vapor balance system would not control or reduce emissions from these products because the vertical fixed roof tank is vented. Vapor would simply be displaced from the tank instead of the truck; therefore, vapor balance is not considered a control option for these product transfers and is eliminated from further consideration.

A vapor balance system cannot be used with an internal floating roof storage tank and was eliminated from further consideration for product transfers through the loading rack from internal floating roof storage tanks to tanker trucks. As previously discussed for EU-4, EU-5, and EU-6, VRUs are not a feasible control technology for variable VOC streams, or streams that could be laden with vapors of the product stored in EU-4, EU-5, and EU-6. It is possible that trucks on site could have contained this product as a prior product load; therefore, the product's vapors would be displaced instead of gasoline vapors. The facility conservatively assumed gasoline vapors would be displaced as a worst-case assumption to develop the highest emission rate scenario and it is possible that this product's vapors composition may be higher during actual operations. For the reasons previously discussed, VRUs are considered technically infeasible for streams that could be laden with these product vapors and variable VOC streams. VRUs are eliminated form further consideration. VCUs and submerged fill design are further evaluated for this products transfers.

Rank Remaining Technically Feasible Control Options

The technically feasible control options for the product transfers from EU-4, EU-5, and EU-6 through the loading rack can be ranked in the following order:

1. VCU (98%); and
2. Submerged Filling (36.5%)

The only remaining feasible control option for the product transfers from EU-7 through the loading rack is submerged filling.

Evaluate Remaining Control Technologies

VCUs are commonly used to destruct VOC emissions from rail and truck loading. Supplemental fuel gas may be required for complete combustion. A VCU is expected to be the most effective control device for controlling VOC emissions from the product transfers from EU-4, EU-5, and EU-6 to tanker trucks through the loading rack and is proposed as RACT.

Submerged filling will be utilized for products transfers to tanker trucks.

RACT Limit Overview

As previously mentioned, there are no federal or state emission standards for VOC emitted from the proposed truck loading rack. The facility performed a thorough review of state and federal regulatory limits imposed on emissions sources at similar operations. The results of this regulatory review indicate that the most stringent VOC limits for loading racks are found in MACT R – "National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Breakout Stations)," which exclusively applies to major sources of HAP. Vapor collection and control systems are limited in MACT R to 10 mg VOC/L of liquid gasoline loaded.

Additional limits for similar emissions sources are found in state regulations and the Gasoline Distribution GACT, - "National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities," which applies at HAP area sources in the source category. The Gasoline Distribution GACT and GRAQC 391-3-1-.02(2)(cc) limit emissions from the loading rack to 80 mg/L of liquid gasoline loaded (equivalent to 4.7 grains per gallon of gasoline loaded). The facility proposes the RACT limit to be 12.0 mg/L of liquid loaded.

Georgia VOC regulations containing the 4.7 grains per gallon of gasoline loaded limit are a presumptive RACT requirement for gasoline terminals. Although the facility is not subject to a presumptive RACT because it is not in an applicable category, the facility is selecting controls beyond that which might have been required for similar types operations. The facility proposes to limit controlled VOC emissions from the loading rack to 12.0 mg/L of liquid loaded.

<u>Select RACT</u>

RACT is proposed to be a VCU to control VOC emissions from  product transfers from EU-4, EU-5, and EU-6 to tanker trucks through the loading rack. The VCU will reduce VOC emissions from product transfers through the loading rack to 12.0 mg/L of liquid loaded. Additionally, all trucks will be loaded via submerged fill pipe.

**Direct Transloading (Railcar to Truck) EU-2**

On occasion, products may be transloaded directly from railcar to truck. Loading losses occur as organic vapors in “empty” tanks are displaced into the atmosphere by the liquid being loaded into the tanks.

*RACT Floor*

There are no federal or state emission standards for VOCs emitted from the direct proposed rail to truck transloading.

<u>Identify Available Control Technologies</u>

The following control technologies or mitigation techniques were identified to reduce VOC emissions from direct transloading processes.

- Vapor Balance System;
- VCU;
- VRU; and
- Submerged fill design.

<u>Eliminate Technically Infeasible Options</u>

Each of the identified control devices and mitigation techniques are technically feasible. As previously discussed, VRUs are not a feasible control technology for variable VOC streams, or streams that could be laden with vapors of products that will be directly transloaded. It is possible that trucks on site could have contained these products as a prior product load; therefore, these products’ vapors would be displaced instead of gasoline vapors, which would render the VRU ineffective and result in overheating. Therefore, VRUs are considered technically infeasible for streams that could be laden with these products’ vapors and variable VOC streams. VRUs are eliminated form further consideration.

VCUs and submerged fill design are further evaluated as technically feasible control options.

Rank Remaining Technically Feasible Control Options

The technically feasible control options for these direct product transfers through the portable pump can be ranked in the following order:

1. Vapor Balance System (98.7%);
2. VCU (98%); and
3. Submerged Filling (36.5%)

Evaluate Remaining Control Technologies

A vapor balance system is the top, most effective control technology and is selected as RACT for direct transfers of these products. Furthermore, these products cannot be directly transloaded without a vapor balance system because the railcar would collapse.

Select RACT

RACT is proposed to be use of a vapor balance system, with 98.7% collection and control efficiency for direct transfers of these products from rail to truck.

**Transloading EU-3**

The product is transferred from railcars to ten storage tanks and then to trucks under pressure using a closed-loop system. There are no emissions from breathing and working losses. Emissions occur when hose ends are disconnected and a small amount of this product near the connection point is emitted as fugitive VOC. There are no federal or state emission standards for VOCs emitted from the proposed transloading operations.

The total uncontrolled VOC emissions are expected to be 0.16 tpy, which is below the threshold at which add-on controls are applicable. If captured, the concentration of these fumes would be too dilute for a control device to be technically effective at reducing VOC emissions. RACT is proposed to be proper operation of this products transloading equipment to ensure additional fumes are not generated.

**Equipment Leaks**

The facility will generate fugitive VOC emissions dues to the release of gases from process equipment from valves, pumps, compressors, seals, flanges, and connectors. Leakage occurs due to compromised piping connections, valve stems, rotary shaft seals, and other similar connection interfaces.

*RACT Floor*

There are no federal or state regulatory emission standards for VOCs emitted from these sources associated with the facility. Baseline emissions are simply uncontrolled emissions.

Identify Available Control Technologies

Based on information obtained from the U.S. EPA's RBLC database, recently submitted permit applications, and air pollution control guidance documents, a list of potential VOC controls for these sources was developed. The RBLC did not indicate the use of an add-on control technology for the control of fugitives from equipment leaks. The top control methodology as indicated by the RBLC is the use of a Leak Detection and Repair (LDAR) program.

- Proper Piping Design and Installation - Proper piping design and initial installation can help ensure a leak-tight system. Proper design and installation practices can include the following:
  - o Ensure proper bracing;
  - o Manual verification that all joints are tight;
  - o Manual visual confirmation that all pipes are properly assembled;
  - o Design piping for adequate/desired pressure;
  - o Ensure proper seal design/selection;
  - o Ensure proper installation of valve packing or O rings; and
  - o Manually inspect the installation of the disk gaskets on pressure relief devices.
- Leak Detection and Repair (LDAR) Program – The main purpose of an LDAR program is to identify unintended equipment leaks of VOCs and repair them (e.g., leaks from valves, pumps, connectors, compressors, and agitators). Leaks may be detected through several types of LDAR programs, such as Auditory/Visual/Olfactory (AVO) and U.S. EPA Method 21 – Determination of Volatile Organic Compound Leaks. AVO is an LDAR monitoring method which involves visual inspections and observations (such as fluids dripping, spraying, misting or clouding from or around components), sound (such as hissing), and smell. Leaks detected in this manner require immediate repair. AVO does not require specific monitoring frequencies unless specified by applicable state and/or federal regulations. Similarly, optical gas imaging (OGI) systems can be used to inspect system components and detect air leaks. OGI systems operate using an infrared camera to visualize leaking components for flagging and repair. OGI requires significant upfront capital investment for the purchase of the OGI camera

U.S. EPA Method 21 is applicable for the determination of VOC leaks from process equipment (e.g., valve, flanges, pumps, compressors, etc.). Method 21 uses a portable instrument to detect VOC emissions from individual equipment components. Method 21 requires VOC emissions from regulated components to be measured in ppm, and the threshold standard vary by regulation, component type, service (e.g., light liquid, heavy liquid, gas/vapor), and monitoring interval. Most NSPS regulations have a leak definition of 10,000 ppm while most NESHAP use a 500-ppm or 1,000-ppm leak definition. As with leak thresholds, monitoring intervals vary according to the applicable regulation. Monitoring intervals can be weekly, monthly, quarterly, and yearly depending on the regulatory driver. Typically, Method 21 is implemented as part of a facility's LDAR program when an applicable federal regulation mandates that Method 21 LDAR is required. There are 25 federal regulations that specify the use of an LDAR program utilizes Method 21. The facility is not subject to state or federal regulations that require the use of U.S. EPA Method 21.

<u>Eliminate Technically Infeasible Options</u>

Both proper piping design and the implementation of an LDAR program are considered technically feasible control technologies.

<u>Rank Remaining Technically Feasible Control Options</u>

Based on research conducted as part of this RACT, an LDAR program is considered to be the top control options to minimize VOC emissions from leaks.

1. LDAR Program (30% - 97%); and
2. Proper Piping Design and Installation.

Evaluate Remaining Control Technologies

The facility will not be subject to any state or federally enforceable LDAR programs and because predicted annual VOC emissions from equipment leaks are low (0.17 tpy), the use of an LDAR program will be economically burdensome and not viable in order to satisfy RACT.

Select RACT

RACT is proposed to be proper piping design and installation to help ensure a leak-tight system. Proper design and installation practices may include the following techniques: manually verifying that all joints are tight; visually confirming that all pipes are properly assembled; ensuring proper seal design/selection; ensuring proper installation of valve packing or O rings; and manually inspecting the installation of the disk gaskets on pressure relief devices.

## Permit Conditions

Conditions 1.1 through 1.5 are the standard general requirement template conditions for the facility. They require emissions to be minimized, the Division to be notified of any modification to the facility and that records be kept for a period of 5 years. Condition 1.6 establishes the applicability of 40 CFR 60 Subpart A – "General Provisions."

Conditions 2.1 and 2.2 include limits for Title V avoidance. Condition 2.3 limits the throughput and emissions of the transloading operation to maintain synthetic minor (SM) status. Condition 2.4 establishes the applicability of 40 CFR 60 Subpart Kb. Conditions 2.5 and 2.6 establish the applicability of Georgia Rule (b), limiting opacity to 40 percent and Georgia Rule (e), limiting particulate matter emissions. Condition 2.7 lists the RACT requirements for the affected processes and equipment.

Condition 3.1 limits the opacity from fugitive dust sources to 20 percent in accordance with Georgia Rule (n).

Conditions 4.1, 4.2, and 4.3 require routine maintenance, proper equipment, and operation of process and control equipment.

Conditions 5.1, 5.2, and 5.3 contain the monitoring requirements for the control systems. Condition 5.4 contains the monitoring requirements for the tanks subject to 40 CFR Subpart Kb.

Condition 6.1 contains the current standard template conditions for performance tests. Condition 6.2 requires the facility to conduct a performance test of the VCU to demonstrate compliance with the VOC limit of 12 mg/l contained in Condition 2.3.

Conditions 7.1 and 7.2 require written notifications for construction and startup of the facility and specified equipment. Conditions 7.3, 7.4, and 7.5 require keeping records on throughput and equipment failures, which are used to calculate monthly throughput and report deviations. Condition 7.6 requires written reports to be submitted semi-annually. Condition 7.7 requires maintaining files on monitoring systems. Conditions 7.8, 7.9, 7.10, 7.11, and 7.12 contain the recordkeeping and reporting requirements for the tanks subject to 40 CFR 60 Subpart Kb.

Conditions 8.1, 8.2, and 8.3 are the current standard template conditions, which allow the Division to amend the permit, require an annual permit fee, and require keeping a copy of the permit onsite.

**Toxic Impact Assessment**

A toxic impact assessment was prepared and submitted by the applicant. AERMOD was used to evaluate 1,3-Butadiene, Benzene, and Chromium emissions from the facility. The maximum concentrations of 1,3-Butadiene, Benzene, and Chromium were below the acceptable ambient pollutant concentrations. Modeling was reviewed and verified by the Divisions Data and Modeling Unit.

**Summary & Recommendations**

I recommend that Permit No. 5172-121-0962-S-01-0 be issued to Norfolk Southern Railway Company for the construction and operation of the facility to store and transfer volatile organic liquid and bulk solid commodities between railcars and trucks, including storage tanks and a VCU for controlling emissions. The proposed plant will be located at 3095 Parrott Avenue Northwest in Atlanta (Fulton), GA. This facility is a synthetic minor source with regard to Title V. It is assigned to the Stationary Source Compliance Program (SSCP) for compliance purposes. A public advisory was issued and expires on June 5, 2020.